

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Robertson, Anschutz & Schneid, P.L. 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone Number 561-241-6901 Attorneys For Secured Creditor Miriam Rosenblatt, Esq. (MR-7505)	CASE NO.: 17-28108-CMG CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Judith Linton, Debtor	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR HOME EQUITY MORTGAGE LOAN ASSET-BACKED TRUST SERIES INABS 2007-A, HOME EQUITY MORTGAGE LOAN ASSET-BACKED CERTIFICATES SERIES INABS 2007-A ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 2), and states as follows:

1. Debtor, Judith Linton, {and Joint Debtor, , ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on September 5, 2017.
2. Secured Creditor holds a security interest in the Debtor's real property located at 448-50 HALSTED ST, EAST ORANGE, NJ 07018, by virtue of a Mortgage recorded on January 23, 2007 at Instrument number 7010322 of the Public Records of Somerset County, NJ. Said Mortgage secures a Note in the amount of \$246,000.00.
3. The Debtor filed a Chapter 13 Plan on September 5, 2017.
4. Debtor's Plan fails to state the total arrearage amount owed. It is anticipated that Secured Creditor's claim will show the pre-petition arrearage due Secured Creditor is \$2,945.38. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed. Secured Creditor objects to any plan which proposes to pay it anything less than \$2,945.38 as the pre-petition arrearage over the life of the plan.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

Robertson, Anschutz & Schneid, P.L.
Attorney for Secured Creditor
6409 Congress Ave., Suite 100
Boca Raton, FL 33487
Telephone Number 561-241-6901

By: /s/Miriam Rosenblatt
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CERTIFICATION OF SERVICE

1. I, Miriam Rosenblatt, represent DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR HOME EQUITY MORTGAGE LOAN ASSET-BACKED TRUST SERIES INABS 2007-A, HOME EQUITY MORTGAGE LOAN ASSET-BACKED CERTIFICATES SERIES INABS 2007-A
in this matter.
2. On 10/2/2017, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

10/2/2017

Robertson, Anschutz & Schneid, P.L.
Attorney for Secured Creditor
6409 Congress Ave., Suite 100
Boca Raton, FL 33487
Telephone Number <<Special.FirmPhone>

By: /s/Miriam Rosenblatt
Miriam Rosenblatt, Esquire
NJ Bar Number MR-7505
Email: mrosenblatt@rasflaw.com

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Boyer Coffy, LLC Leonard R Boyer Attorney for Judith Linton 1000 Clifton Ave. Ste 200 Clifton, NJ 07013	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Albert Russo CN 4853 Trenton, NJ 08650-4853	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
U.S. Trustee. US Dept of Justice One Newark Center, Ste 2100 Newark, NJ 07102	U.S. Trustee.	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Judith Linton 19 Haas Road Basking Ridge, NJ 07920	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)